

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No. 19-34574-KRH

Chapter 7

**PROPOSED AGENDA FOR HEARING ON
JUNE 24, 2021, AT 11:00 A.M. (PREVAILING EASTERN TIME)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, United States Courthouse, 701 East Broad Street, Richmond, Virginia 23219, on June 24, 2021, beginning at 11:00 a.m. via Zoom:

Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJIsfu-prjwjHBxUGrVRcV1Wxe0tI28j8M4>

Listen-only conference line:

Dial: 1-866-590-5055

Access Code: 4377075

Security Code: 62421

I. MATTERS OF THE TRUSTEE AND/OR THE ESTATE

1. Statement -*TRUSTEES NINTH SUPPLEMENT TO HER MOTION FOR AUTHORITY TO OPERATE CERTAIN ASPECTS OF THE DEBTORS BUSINESS FOR A LIMITED PERIOD AND MEMORANDUM IN SUPPORT THEREOF* (Re: related

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

Paula S. Beran, Esquire (Va. Bar No. 34679)
Tavener & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

Counsel for Lynn L. Tavener, Chapter 7 Trustee

document(s)[144](#) Motion to Authorize filed by Lynn L. Tavenner) filed by Paula S. Beran on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 910]

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s) 143 Motion to Approve Use of Cash Collateral filed by Lynn L. Tavenner, 144 Motion to Authorize filed by Lynn L. Tavenner, 145 Motion to Expedite Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 10/4/2019 at 01:30 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Beran, Paula) [ECF No. 146]
- b. Hearing held and continued; Motion Granted on Interim Basis; Order to be submitted (Re: related document(s) 144 Motion to Authorize filed by Lynn L. Tavenner) Appearances: Paula Beran, Douglas Foley; Robert Van Arsdale. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Oliver, Betty) [ECF No. 149]
- c. Interim Order Authorizing Trustee to Operate Certain Aspects of Debtor's Business for a Limited Period. (Re: related document(s) 144 Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Bullock, Nathaniel) [ECF No. 155]
- d. Supplemental Motion to Authorize (Trustee's Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtor's Business for a Limited Period and Memorandum in Support Thereof) (Related Document(s) [144] Motion to Authorize filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 165]
- e. Supplemental Order Authorizing Trustee to Continue to Operate Certain Aspects of Debtor's Business for a Limited Period (Re: related document(s) [144] Motion to Authorize filed by Lynn L. Tavenner) Continued Final Hearing scheduled for 12/19/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Ramirez-Lowe, Suzan) [ECF No. 196]
- f. Motion to Authorize (Trustee's Second Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtor's Business for a Limited Period and Memorandum in Support Thereof) (Related Document(s) [144] Motion to Authorize filed by Lynn L. Tavenner, [165] Motion to Authorize filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 290]

- g. Hearing continued; (Re: related document(s) [144] Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 2/25/2020 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Oliver, Betty) [ECF No. 304]
- h. Second Supplemental Order Authorizing Trustee to Operate Certain Aspects of Debtor's Business for a Limited Period Order (Re: related document(s) 144 Motion to Authorize filed by Lynn L. Tavenner, 165 Motion to Authorize filed by Lynn L. Tavenner) Continued Hearing scheduled for 2/25/2020 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Ramirez-Lowe, Suzan) [ECF No. 313]
- i. Motion to Authorize (Trustee's Third Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtor's Business for a Limited Period and Memorandum in Support Thereof) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 359]
- j. Hearing continued; (Re: related document(s) 144 Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 4/30/2020 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Paula Beran for Trustee. (Oliver, Betty) [ECF No. 373]
- k. Third Supplemental Order Authorizing Trustee to Continue to Operate Certain Aspects of Debtor's Business for a Limited Period (Re: related document(s) 359 Motion to Authorize filed by Lynn L. Tavenner) (Ramirez-Lowe, Suzan) [ECF No. 396]
- l. Motion to Authorize (Trustee's Fourth Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtor's Business for a Limited Period and Memorandum in Support Thereof) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 432]
- m. Hearing continued; Appearance(s): Paula Beran for Trustee (Re: related document(s) 144 Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 6/25/2020 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Oliver, Betty) [ECF No. 440]
- n. Order Granting Trustee's Fourth Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtors Business for a Limited Period (Related Doc # 432) (Ramirez-Lowe, Suzan) [ECF No. 452]
- o. Supplemental Motion to Authorize (Trustee's Fifth Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtor's Business for a Limited Period and Memorandum in Support Thereof) (Related Document(s) [144] Motion to Authorize filed by Lynn L. Tavenner, [165] Motion to Authorize filed by Lynn L.

Tavener, [290] Motion to Authorize filed by Lynn L. Tavenner, [359] Motion to Authorize filed by Lynn L. Tavenner, [432] Motion to Authorize filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 535]

- p. Hearing continued; Appearance(s): Paula Beran for Trustee (Re: related document(s) [144] Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 8/27/2020 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Oliver, Betty) [ECF No. 545]
- q. Fifth Supplemental Order Authorizing Trustee to Operate Certain Aspects of the Debtor's Business for a Limited Period(Re: related document(s)[535] Motion to Authorize filed by Lynn L. Tavenner) (Ramirez-Lowe, Suzan) [ECF No. 551]
- r. Motion to Authorize (Trustee's Sixth Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtor's Business for a Limited Period and Memorandum in Support Thereof) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 598]
- s. Sixth Supplemental Order Authorizing Trustee to Continue to Operate Certain Aspects of the Debtor's Business for a Limited Period. (Re: related document(s)598 Motion to Authorize filed by Lynn L. Tavenner) (Ramirez-Lowe, Suzan) [ECF No. 619]
- t. Statement – *Trustees Seventh Supplement to her Motion for Authority to Operate Certain Aspects of the Debtors Business for a Limited Period and memorandum In Support Thereof* (Re: related document(s)619 Supplemental Order) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 710]
- u. Hearing Held and continued; Motion Granted on Interim Basis. Appearance(s): Paula Beran for Trustee (Re: related document(s)[144](#) Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 3/25/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) [ECF No. 716]
- v. Order Granting Motion to Authorize Trustee to Continue to Operate Certain Aspects of Debtor's Business for a Limited Period (Related Doc # [144](#)) (Bray, Lynessa) [ECF No. 725]
- w. Statement - *TRUSTEES EIGHTH SUPPLEMENT TO HER MOTION FOR AUTHORITY TO OPERATE CERTAIN ASPECTS OF THE DEBTORS BUSINESS FOR A LIMITED PERIOD AND MEMORANDUM IN SUPPORT THEREOF* (Re: related document(s)[144](#)Motion to Authorize filed by Lynn L. Tavenner) filed by

Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 791]

- x. Hearing held and continued; Motion Granted on Interim Basis; Declaration of Lynn Tavenner 795 Admitted. Appearance(s): Paula Beran for Trustee (Re: related document(s)[144](#) Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 6/24/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) [ECF No. 797]
- y. Eighth Supplemental Order Authorizing Trustee to Continue to Operate Certain Aspects of Debtor's Business for a Limited Period Re: related document(s)[144](#) Motion to Authorize filed by Lynn L. Tavenner, [791](#) Statement filed by Lynn L. Tavenner) (Bullock, Nathaniel) [ECF No. 805]

Response Deadline: June 21, 2021

Responses Filed: None

Status:

The Trustee will request that the Court enter an Order, in substantially the same form as Exhibit A attached to the Supplement: (1) authorizing the Trustee to continue to conduct the Wind-down Operations (as defined in the Supplement); (2) setting a continued hearing for September 23, 2021, at 11:00 a.m.; and (3) granting such other and further relief as is just and appropriate under the circumstances

- 2. Motion to Authorize *TRUSTEES MOTION FOR AN ORDER AUTHORIZING THE EXECUTION OF NOTICES OF PROPOSED ADJUSTMENTS AND MEMORANDUM IN SUPPORT THEREOF* filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Attachments: # [1](#) Schedule A) (Beran, Paula) [ECF No. 914]

Related documents:

- a. Notice of Motion and Notice of Hearing *NOTICE OF MOTION AND HEARING THEREON IF NECESSARY* (Re: related document(s)[914](#) Motion to Authorize filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 6/24/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Attachments: # [1](#) Schedule A)(Beran, Paula) [ECF No. 915]

Response Deadline: June 21, 2021

Responses Filed: None

Status: The Trustee will request that the Court enter an Order approving the Motion and authorizing the Trustee and/or her professionals to execute and deliver the Audit Forms (as defined in the Motion).

II. MATTERS OF THIRD PARTIES

3. Motion for Relief from Stay Re: Insurance Policy filed by Rebecca L. Saitta of Wiley Rein LLP on behalf of Columbia Casualty Company. (Attachments: # [1](#) Exhibit(s) A # [2](#) Proposed Order) (Saitta, Rebecca) [ECF No. 857]

Related documents: Columbia Casualty Company's Notice of Motion and Hearing filed by Rebecca L. Saitta of Wiley Rein LLP on behalf of Columbia Casualty Company. (Saitta, Rebecca) [ECF No. 859]

Response Deadline: June 17, 2021

Responses Filed: Objection to - *TRUSTEES ANSWER AND LIMITED OBJECTION TO THE MOTION FOR RELIEF FROM THE AUTOMATIC STAY* (Re: related document(s) [857](#) Motion for Relief from Stay filed by Columbia Casualty Company) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 921]

Status: The Trustee objects to the relief demanded in the Motion and therefore respectfully requests that matter be set down for final hearing on July 22, 2021, at 1:00 p.m.

III. MATTERS IN ADVERSARY PROCEEDINGS

4. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Defendant's Motion to Dismiss Adversary Proceeding */Partially Dismiss the Complaint* filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX

Partners, LLC, UnitedLex Corporation. (Attachments: # [1](#) Proposed Order) (McKee, Thomas) [ECF No. 17]

Related documents:

- a. Memorandum of Law in Support (Re: related document(s)[17](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Partners, LLC, UnitedLex Corporation. (Attachments: # [1](#) Exhibit(s) Exhibit A # [2](#) Exhibit(s) Exhibit B # [3](#) Exhibit(s) Exhibit C)(McKee, Thomas) [ECF No. 18]
- b. Reply to *Trustee's Opposition to Defendants' Motion to Partially Dismiss the Complaint* (Re: related document(s)[17](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Partners, LLC, UnitedLex Corporation. (McKee, Thomas) [ECF No. 26]
- c. Notice of Hearing (Re: related document(s)[17](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Partners, LLC, UnitedLex Corporation. Hearing scheduled for 3/25/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McKee, Thomas) [ECF No. 27]
- d. Order Continuing Hearing (Re: related document(s)[17](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation, [25](#) Objection to Motion/Application filed by Lynn L. Tavenner, as Chapter 7 Trustee, [26](#) Reply to Motion/Application filed by ULX Partners, LLC, UnitedLex Corporation) Hearing scheduled for 4/27/2021 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Bullock, Nathaniel) [ECF No. 30]
- e. Order Setting Status Conference (Re: related document(s)[17](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation) Hearing scheduled for 4/27/2021 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Bullock, Nathaniel) [ECF No. 41]
- f. Order Setting Hearing (Re: related document(s)[17](#) Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation) Hearing scheduled for 6/24/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Bullock, Nathaniel) [ECF No. 50]

Responses Filed: Objection to (Plaintiffs Opposition to Defendants Motion to Partially Dismiss the Complaint) (Re: related document(s)17 Motion to Dismiss Adversary Proceeding filed by ULX Partners, LLC, UnitedLex Corporation) filed by Erika L. Morabito of Foley & Lardner on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Morabito, Erika) [ECF No. 25]

Status: The Trustee will request that the Court deny the Defendants' Motion to Partially Dismiss.

IV. REPORTS

5. Case Status and Report pursuant to Local Rule 2015-(a)-(1)(A)

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: June 22, 2021
Richmond, Virginia

By: /s/ Paula S. Beran
Paula S. Beran, Esquire (VSB No. 34679)
PBeran@TB-LawFirm.com
Tavenner & Beran, PLC
20 North 8th Street
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopier: (804) 783-0178

Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court and applicable orders, I certify that on this 22nd day of June 2021, a true copy of the foregoing Agenda was sent electronically to all parties receiving ECF notices in this Case.

/s/ Paula S. Beran

Counsel for Lynn L. Tavenner, Chapter 7 Trustee